AIR RESOURCES BOARD

1102 Q STREET .0. BOX 2815 \CRAMENTO, CA 95812



August 19, 1991

David J. Parrish Engineering Manager Emco Wheaton, Inc. 4001 Weston Parkway Cary, NC 27513

Dear Mr. Parrish:

#91-16

Certification of Emco Wheaton Alloo Guardian Overfill Prevention

You requested certification of the Emco Wheaton Al100 overfill prevention. This product was approved for use in two point installations on January 23, 1991. The Al100 overfill prevention system consists of a tube which is installed in the drop tube. For coaxial installations, an adaptor kit is available. Approval of the system for use with coaxial systems was withheld pending leak testing of the poppeted coaxial system.

The leak test consists of pressurizing the ullage space in a storage tank with dry Nitrogen gas to a pressure of ten inches and observing the rate of decay. Coaxial installations should be tested with the fill cap removed to verify the integrity of the vapor poppet. Tests conducted on a coaxial Al100 in February revealed vapor leak sources in both the overfill prevention tube and in the coaxial vapor gasket assembly. Several modifications to the design were made, and the product was retested. The results indicate that the improved design is virtually leak free. The improvements will be incorporated into all Al100 tubes.

As required by the Air Resources Board certification and test procedures, you requested the approval of the Division of Occupational Health and Safety, the Office of the State Fire Marshal and the Department of Food and Agriculture, Division of Measurement Standards. The necessary approvals have been obtained from these agencies.

I find that the use of the A1100 system will not adversely affect vapor recovery systems on which it may be installed. Therefore, the Emco Wheaton A1100 Guardian overfill prevention system is certified for use with Phase I gasoline vapor recovery systems. If you have any questions, please call Laura McKinney, Associate Air Pollution Specialist, at (916) 327-1525.

Sincerely,

James J. Morgester, Chief Compliance Division

cc: All APCDs and AQMDs
Vapor Recovery Technical Committee Members
CAP Gasoline Marketing and Distribution Manual